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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DEBTORS' AND SHAREHOLDER
PROONENTS' JOINT OBJECTIONS TO
AMENDED SECURITIES LEAD
PLAINTIFF'S EXHIBIT LIST FOR
CONFIRMATION HEARING**

Pursuant to this Court’s *Order Establishing Confirmation Hearing Protocol* [Dkt. No. 7182] (the “**Hearing Protocol Order**”), PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), and the Shareholder Proponents hereby submit their objections to the Amended Securities Lead Plaintiff’s Exhibit List for Confirmation Hearing, filed May 25, 2020 [Dkt. No. 7571], through which the Public Employees Retirement Association of New Mexico (“**Lead Plaintiff**”) identified additional exhibits for the hearing to consider confirmation of the Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated March 16, 2020 [Docket No. 6320] (as amended on May 22, 2020 [Docket No. 7521], and as it may be amended, modified or supplemented from time to time, and together with any exhibits or schedules thereto, the “**Plan**”). The Debtors and Shareholder Proponents reserve all rights to assert additional grounds for objection.¹ The Plan Proponents’ objection(s), if any, to a particular exhibit are listed in the “Basis for Objection” column:

Exhibit	Basis for Objection
A. Securities Lead Plaintiff’s Exhibit List [ECF No. 7571]	
SP-001. Lead Plaintiffs’ First Set of Document Demands to the Debtors in Connection with Confirmation of the Plan	Relevance;
SP-002. Email from Richard Slack to Randy Michelson, dated 05/14/2020 10:09 PM, re: Document Requests	Relevance
SP-003. Email from Randy Michelson to Richard Slack, dated 5/18/2020 2:25 PM, re: Document Requests	Relevance
SP-004. Memorandum in Opposition to Officer Defendants’ Motion to Dismiss Third Amended Consolidated Class Action Complaint, Case No. 5:18-cv-03509-EJD, Docket No. 160, including Appendix A, Docket No. 160-1	Untimely ² ; Improper Sur-reply Designation

¹ Capitalized terms used but not otherwise defined herein shall have the meanings given to such terms in the Plan.

² See Hearing Protocol Order at 3 (“Objecting parties that intend to participate at the Confirmation Hearing must identify all exhibits they intend to use at the Confirmation Hearing” by May 18, 2020.”).

Exhibit	Basis for Objection
SP-005. Plaintiffs' Opposition to the Defendant Directors and Underwriters' Motion to Dismiss Third Amended Complaint and the Officer Defendants' Joinder of Said Motion, Case No. 5:18-cv-03509-EJD, Docket No. 161	Untimely; Improper Sur-reply Designation
SP-006. Plaintiff's (1) Opposition to Officer Defendants' Request for Judicial Notice and (2) Cross-Request for Judicial Notice, Case No. 5:18 -cv-03509-EJD, Docket No. 162	Untimely; Improper Sur-reply Designation
SP-007. Declaration of Louis Gottlieb in Support of Plaintiff's (1) Opposition to Officer Defendants' Request for Judicial Notice and (2) Cross-Request for Judicial Notice (with attached Exhibits), Case No. 5:18-cv-03509-EJD, Docket No. 164)	Untimely; Improper Sur-reply Designation; Hearsay; Foundation
SP-008. The daily opening and closing prices of PG&E Corp. common stock (PCG) on the Petition Date, January 29, 2019	Untimely; Improper Sur-reply Designation
SP-009. Report listing the trading volume of the Debtors' stock between November 15, 2018 and the July 1, 2019 Record Date, retrieved from https://finance.yahoo.com/quote/PCG/key-statistics?p=PCG and attached as Exhibit 1 to Declaration of Andrew D. Behlmann, Esq. in Support of Securities Lead Plaintiff's Reply in Further Support of Motion to Apply Bankruptcy Rule 7023 to Class Proof of Claim, ECF No. 5458-1	Untimely; Improper Sur-reply Designation
SP-010. Notice of Extended Deadline for Filing Certain Securities Claims for Rescission or Damages, ECF No. 5943-2	Untimely; Improper Sur-reply Designation

Dated: May 26, 2020
New York, New York

WEIL, GOTSHAL & MANGES LLP

KELLER BENVENUTTI KIM LLP

By: /s/ Theodore E. Tsekerides
Theodore E. Tsekerides

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